

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ACCESS 4 ALL, INC., a Florida not for  
profit corporation, and FELIX  
ESPOSITO, Individually,

Plaintiffs,

v.

47 HUNTINGTON AVENUE, LLC, a  
Massachusetts Limited Liability  
Company,

Defendant.

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Case Number: 1:04-cv-12231-NG

**MOTION OF THE PLAINTIFF  
TO PERMIT COUNSEL  
TO APPEAR PRO HAC VICE**

In accordance with 83.5.3(b) of the Local Rules of the United States District Court District of Massachusetts that governs the admission and practice of attorneys in said District Court, the undersigned respectfully moves for the admission of **John P. Fuller, Esquire**, 12000 Biscayne Blvd., Suite 609, North Miami, Florida 33181, (305) 891-5199, [jpf@fullerfuller.com](mailto:jpf@fullerfuller.com), for purposes of appearing as counsel on behalf of Plaintiffs, Access 4 All, Inc. and Felix Esposito, in the above-styled case.

John P. Fuller certified herewith that he has studied the Local Rules of this Court and is a member in good standing of the Florida Bar; and is admitted to the United States District Court for the Southern, Middle and Northern Districts of Florida, as well as the United States Court of Appeals for the Fifth and Eleventh Circuits. Mr. Fuller's Florida Bar Number is 0276847. There are no disciplinary proceedings against Mr. Fuller in any jurisdiction. Certificates of good standing from The Florida Bar and the U.S. District Court for the Southern District of Florida are attached hereto as Exhibits A & B respectively. Mr. Fuller is a partner with the law firm of Fuller, Fuller & Associates,

P.A., and has been a member of the Florida Bar for over twenty (20) years. An Affidavit of John P. Fuller in Support of this Motion to Admit Counsel Pro Hac Vice is attached hereto as Exhibit C.

In further support of this motion, it is hereby designated that O. Oliver Wragg is a member of the Bar of this Court. He is also a person to whom the Court and Counsel may readily communicate and upon whom papers may be served.

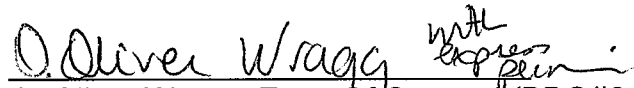
Mr. Fuller is familiar with the Local Rules of the United States District Court for the District of Massachusetts and his application for leave to practice in this court is on motion of a member of the bar of this court, who has already appeared as counsel for the Plaintiffs, Access 4 All, Inc., and Felix Esposito. Additionally, Mr. Fuller has also submitted the required \$50.00 filing fee to the Clerk of the U.S. District Court.

WHEREFORE, the plaintiffs request that this Court grant John P. Fuller permission to appear before this Court pro hac vice.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for the Defendant, 47 Huntington Avenue, LLC, have been informed of the filing of the foregoing motion and that counsel for the Defendant have assented to the foregoing motion.

Respectfully submitted,

The signature is handwritten in black ink, reading "O. Oliver Wragg" with a flourish at the end.

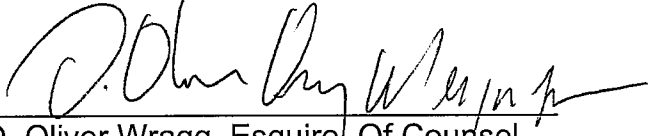
O. Oliver Wragg, Esq., Of Counsel (BBO#643152)  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been furnished via e-mail on this 8<sup>th</sup> day of April 2005 to:

Gordon P. Katz, Esq., [gordon.katz@hklaw.com](mailto:gordon.katz@hklaw.com)

Mary A. Lau, Esq., [mlau@laurane.com](mailto:mlau@laurane.com)

  
O. Oliver Wragg, Esquire, Of Counsel